

REMARKS

The Applicant wishes to thank the Examiner for thoroughly reviewing and considering the pending application. The Official Action dated September 28, 2005 has been received and carefully reviewed. Claim 67 has been amended. Claims 1 and 2 were previously canceled. Claims 24-66 were previously withdrawn. Accordingly, claims 3-23 and 67-70 are currently pending. Reexamination and reconsideration are respectfully requested.

The Official Action rejected claims 3-8, 10-21, 23, and 67-70 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,036,583 to *Aizawa et al.* (hereinafter "*Aizawa*"). The Applicant respectfully traverses the rejection.

As required in Chapter 2131 of the M.P.E.P., in order to anticipate a claim under 35 U.S.C. §102, "the reference must teach every element of the claim." The Applicant respectfully submits that *Aizawa* does not teach every element recited in each of claims 3-8, 10-21, 23, and 67-70. To further illustrate, claim 67, the base claim from which claims 3-8, 10-21, and 23 depend, recites a system for polishing surfaces of objects comprising in part "a first transfer robot" and "a second transfer robot" where the first transfer robot is "configured to transfer one of said objects to the polishing unit" and "the second transfer robot being configured to transfer another of said objects to the polishing unit."

Aizawa does not disclose a system as recited in claim 67. The Official Action indicates that *Aizawa* "teaches pushers 34 which are used to transfer wafers to the top rings of polishing units 10a,b." See e.g., the Office Action at page 5. While *Aizawa* teaches pushers 34, the pushers 34 are not transfer robots which transfer objects to a polishing unit. In fact, *Aizawa* teaches that additional transfers robots are required in addition to the pushers 34. See e.g., col. 5, ll. 22-23 and col. 11, ll. 56-59. Since *Aizawa* explicitly teaches the use of a transfer robot which places a wafer on the pushers 34, the pushers 34 cannot function as transfer robots. Thus,

Aizawa does not disclose at least this feature of claim 67. Furthermore, even assuming *arguendo* that the pushers 34 were somehow transfer robots, *Aizawa* does not disclose first and second pushers which transfer objects to the same polishing unit, as recited in claim 67. In addition, the Office Action expressly states “*Aizawa* fails to teach a plurality of robots access[i]ble to the same processing chamber as recited in claim 67.” See e.g., the Office Action at page 3. Therefore, as *Aizawa* does not disclose all the features of claim 67, *Aizawa* cannot anticipate claims 3-8, 10-21, and 23 and the Applicant requests that the rejection be withdrawn.

Claim 70 recites a system for polishing surfaces of semi-conductor wafers comprising in part “a first transfer robot” and “a second transfer robot” where the first transfer robot and the second transfer robot are “configured to transfer semi-conductor wafers to the polishing unit” “wherein the first transfer robot and the second transfer robot cooperatively transfer the semi-conductor wafers to and from the polishing unit.” As previously discussed, *Aizawa* does not disclose these features. Accordingly, claim 70 is patentable over *Aizawa* and the Applicant requests that the rejection be withdrawn.

The Office Action also rejected claims 3-8, 10-21, 23, and 67-70 under 35 U.S.C. § 103(a) as being unpatentable over *Aizawa* in view of U.S. Patent No. 6,267,549 to *Brown et al.* (hereinafter “*Brown*”). The Applicant traverses the rejection.

As required in Chapter 2143.03 of the M.P.E.P., in order to “establish *prima facie* obviousness of the claimed invention, all the limitations must be taught or suggested by the prior art.” The Applicant submits that neither *Aizawa* nor *Wang*, either singularly or in combination, disclose or suggest all the features recited in claims 3-8, 10-21, 23, and 67-70. More specifically, claim 67 has been amended to recite a system for polishing surfaces of objects comprising, among other features, second transfer robot “configured to transfer another of said objects to the polishing unit and transfer said another of said objects from the polishing unit to a second processing unit.” Neither *Aizawa* nor *Brown*, either singularly or in combination,

disclose or suggest this feature. As correctly pointed out in the Office Action, “*Aizawa* fails to teach a plurality of robots access[i]ble to the same processing chamber as recited in claim 67.” See e.g., the Office Action at page 3. Moreover, *Brown* fails to disclose a second transfer robot which is configured to transfer an object to a polishing unit and transfer the object from the polishing unit to a second processing unit. At most, *Brown* teaches two sets of robot arms 16, 22 which access different chambers or the same chamber. However, no where does *Brown* disclose that the robot arms 16, 22 transfer objects between various chambers, as recited in claim 67. Accordingly, claim 67 is, along with claims 3-8, 10-21, 23, 68, and 69 which depend therefrom, patentable over the cited references and the Applicant requests that the rejection be withdrawn.

Claim 70 recites a system for polishing surfaces of semi-conductor wafers, comprising, among other features, a second transfer robot which “is configured to transfer semi-conductor wafers from the polishing unit to a post-polishing unit.” As previously discussed, neither of the cited references, either singularly or in combination, disclose or suggest this feature. Thus, claim 70 is patentable over *Aizawa* in view of *Brown* and the Applicant requests that the rejection be withdrawn.

In addition, the Official Action rejected claims 9 and 22 under 35 U.S.C. §103(a) as being unpatentable over *Aizawa* in view of U.S. Patent No. 5,948,203 to *Wang* (hereinafter “*Wang*”). The rejection of claims 9 and 22 is traversed and reconsideration is respectfully requested.

The Applicant respectfully submits that neither *Aizawa* nor *Wang*, either singularly or in combination, disclose each and every element recited in claims 9 and 22. As discussed above, *Aizawa* fails to disclose each and every element of claim 67, from which claims 9 and 22 depend. Furthermore, *Wang* fails to address the previously noted shortcomings discussed with reference to *Aizawa*. As such, the Applicant respectfully submits that claims 9 and 22 are patentable over *Aizawa* in view of *Wang* under 35 U.S.C. §103(a) and requests that the rejection be withdrawn.

Furthermore, the Office Action rejected claims 9 and 22 under 35 U.S.C. § 103(a) as being unpatentable over *Aizawa* in view of *Brown* as applied to claims 3-8, 10-21, 23, and 67-70, and further in view of *Wang*. The Applicant traverses the rejection.


As detailed above, neither *Aizawa* nor *Brown*, either singularly or in combination, disclose or suggest all the features recited in claim 67, the base claim from which claims 9 and 22 depend. Moreover, *Wang* does not overcome the previously noted shortcomings of *Aizawa* and *Brown*, namely a second transfer robot “configured to transfer another of said objects to the polishing unit and transfer said another of said objects from the polishing unit to a second processing unit.” As such, claims 9 and 22 are patentable over the cited references and the Applicant requests that the rejection be withdrawn.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Notice of the same is earnestly solicited.

The Applicant hereby authorizes the Commissioner of Patents to charge any fees necessary to complete this filing, including any fees required under 37 C.F.R. §1.136 for any necessary Extension of Time to make the filing of the attached documents timely, or credit any overpayment in fees, to Deposit Account No. 50-0911. Further, if these papers are not considered timely filed, then a petition is hereby made under 37 C.F.R. §1.136 for the necessary extension of time.

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Respectfully submitted,

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